

April 17, 2006

Preston Black
Director
Office of Legal Affairs
Indiana State Department of Health

Dear Mr. Black:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis associated with the proposed Rule affecting 410 IAC 5.2 submitted by the Indiana State Department of Health (ISDH). The proposed rule updates existing requirements regarding licensure in the medical radiology industry and adds new occupational classes that must be licensed. The entities affected by these rules consist principally of individual practitioners employed at hospitals or other medical facilities. The description of the rule indicates that the rules governing licensing in the radiology field have not been significantly update since 1983 and that the existing rules do not adequately address the needs of the industry.

The fiscal impact statement does not indicate that there will be incremental costs to currently licensed entities as a result of revisions to the existing rules. The rule does extend licensing requirements to nuclear medicine technologists and radiation therapists. In subsequent communications you have indicated that the number of affected entities is approximately 870, citing data from the American Registry of Radiologic Technologists and the Nuclear Medicine Technology Certification Board. You also indicate that the fee for the required license is \$60.

Your economic impact statement indicates that these revisions to the existing rules and the extension of licensing requirements to nuclear medicine technologists and radiation therapists are necessary in light of significant changes in the industry and the expansion of the those occupational classifications in particular. These costs appear reasonable in light of the industry trends you address in your rule description.

If you have any questions about the comments contained herein please contact me at 232-8962 or rasberry@iedc.in.gov.

Regards,

Ryan Asberry
Director – Research
Indiana Economic Development Corporation